

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MINING PROJECT WIND DOWN HOLDINGS, INC.
(f/k/a Compute North Holdings, Inc.), *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-90273 (MI)
)
)
) (Jointly Administered)
)

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO FERGUSON BRASWELL
FRASER KUBASTA PC’S SECOND INTERIM AND FINAL FEE APPLICATION**

Pursuant to the Procedures for Complex Chapter 11 Cases in the Southern District of Texas, the undersigned representatives of Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) and its affiliates (collectively, the “Debtors”) certify as follows:

1. On May 15, 2023, Ferguson Braswell Fraser Kubasta PC (“FBFK”) filed its *Second and Final Fee Application of Ferguson Braswell Fraser Kubasta PC, Efficiency Counsel to Debtors and Debtors in Possession for the Period from December 7, 2022 Through March 31, 2023* (the “Application”) [Docket No. 1131].

2. The deadline for parties to file responses to the relief requested in the Application was June 5, 2023 (the “Objection Deadline”). More than 24 hours have passed since the Objection Deadline. Counsel for the Debtors has reviewed the Court’s docket and no objection/response to the relief requested in the Application appears thereon. Counsel for the Debtors has not received

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); and Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551). The Debtors’ service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

any objection or response to the Application, and represents to the Court that FBFK is not aware of any such objection or response.

3. Attached hereto is a proposed form of order granting the relief requested in the Application (the “Proposed Order”). Also attached hereto is a redline of the Proposed Order reflecting non-substantive changes between the Proposed Order and the previously filed proposed order.

WHEREFORE, the applicant respectfully requests that the Court enter the Proposed Order, granting the relief requested in the Application, and granting such other and further relief as the Court may deem proper.

[Remainder of Page Intentionally Left Blank]

Respectfully submitted,

Dated: June 9, 2023
Houston, Texas

/s/ James T. Grogan III

PAUL HASTINGS LLP

James T. Grogan III (TX Bar No. 24027354)
600 Travis Street, 58th Floor
Houston, Texas 77002
Telephone: (713) 860-7300
Facsimile: (713) 353-3100
Email: jamesgrogan@paulhastings.com

-and-

Luc Despins (admitted *pro hac vice*)
Sayan Bhattacharyya (admitted *pro hac vice*)
Daniel Ginsberg (admitted *pro hac vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090
Email: lucdespins@paulhastings.com
sayanbhattacharyya@paulhastings.com
danielginsberg@paulhastings.com

-and-

Matthew Micheli (admitted *pro hac vice*)
Michael Jones (admitted *pro hac vice*)
71 South Wacker Drive, Suite 4500
Chicago, Illinois 60606
Telephone: (312) 499-6000
Facsimile: (312) 499-6100
Email: mattmicheli@paulhastings.com
michaeljones@paulhastings.com

Counsel to the Debtors and Debtors in Possession